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To: FSIS Docket Clerk
Docket 03-025IF
Room 102
Cotton Annex
300 12th and C Street, SW.
Washington, DC 20250-3700

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From: Dr. Bruce L. Golden
CEO
Optibrand Ltd., LLC
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Fort Collins, CO 80524
e-mail: Bgolden@Optibrand.com

Subject: Comments on age determination in the Interim Final Rule 03-025IF

Two methods for determining whether cattle are younger or older than 30 months of age are described on [[Page 1869]] in 03-025IF. The two methods that FSIS inspection personnel are to use include: 1) Documentation that identifies the age of the animal, and 2) Dentition status at the time of slaughter. In the FSIS Notices providing direction to the VMO for age determination, the only documentation that is permitted is auditable documentation of approximate birth date.

In the attached document, titled "NOTIFICATION OF FSIS OF A NEW TECHNOLOGY: AN AGING PROCEDURE FOR SLAUGHTER CATTLE USING AUDITABLE RECORDS OF FEEDER CATTLE DENTITION STATUS", a new procedure is described to create highly secure and auditable records of dentition status at younger ages in order to determine age of individuals at slaughter. According to the literature, dentition status prior to the eruption of the first or second incisors is substantially more accurate at determining age than the currently accepted method for dentition status at slaughter.

FSIS has responded with no objection to the Notice of the technology and informed us that we may proceed with its use in their response to our notice, Log Number FSIS 04-NT-046. However, they indicated that they would not provide the inspection personnel with information permitting the use of this method as an acceptable form of age determination records because the interim final rule does not permit it. They were very helpful and did encourage us to submit this comment requesting that the rule be amended to include this procedure.

Current estimates from CattleFax indicate that penalties being paid by cattle feeders for cattle being designated over thirty months of age by dentition exam at slaughter range between \$17 million and \$73 million annually. Permitting

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the inspection personnel to use this highly reliable procedure will substantially reduce this loss without increasing the risk to consumers.

We request that the interim final rule include language that permits a highly auditable and secure method for recording of dentition status at feedlot ages, and that an FSIS Notice be published listing this particular method as one of the acceptable methods for auditable records of age determination that VMOs should use.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce L. Golden". The signature is fluid and cursive, with a large initial "B" and "G".

Dr. Bruce L. Golden
CEO